

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

THE BALTIMORE LIFE
INSURANCE COMPANY,

Plaintiff,

v.

DEBORAH PURNELL, *et al.*

Defendants.

Case No.: 1:16-cv-02773-MJG

* * * * *

STATEMENT SEEKING ATTORNEYS' FEES

Carrie V. O'Brien, Esq. and FRANKLIN AND PROKOPIK. P.C., Pro Bono Counsel, pursuant to the Court's Order of June 22, 2017, hereby submits this Statement Seeking Attorneys' Fees from the Interplead funds, and further states as follows:

1. On March 13, 2017, the Honorable Marvin J. Garbis appointed Ms. O'Brien as Pro Bono Counsel to serve as an informal liaison between the Court and Ms. Purnell and Mr. Bond. *See* (ECF 20). As set forth in Ms. O'Brien's correspondence to this Court, she has contacted and discussed the above-referenced matter with Mr. Bond and Ms. Purnell. She also directed them to file a statement including the basis for which they claim entitlement to the proceeds of the subject life insurance policy.

2. In accordance with the Court's June 22, 2017 Order, Ms. O'Brien hereby submits the following statement in support of her request for attorney's fees. *See* (ECF 30).

3. The rates of Ms. O'Brien and her staff are within the ranges considered reasonable under the Local Rules Lodestar Guidelines. The charges are itemized as follows and set forth in detail in the Invoice attached as Exhibit "A".

<u>Staff</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
Associate	2.9	\$150	\$435.00
Paralegal	.4	\$95	\$38.00
Costs			\$16.97

4. Pursuant to the Affidavit attached as Exhibit "B", the fees were directly related to the items listed in the Invoice.

5. Accordingly, Carrie V. O'Brien, requests that this Court enter an Order providing that Ms. O'Brien and FRANKLIN & PROKOPIK, P.C. a reasonable fee for her services in the amount of \$489.97.

WHEREFORE, as set forth herein, Carrie V. O'Brien and FRANKLIN & PROKOPIK, P.C. seeks the amount of \$489.97 for attorney's fees and costs from the Interplead funds in the above-captioned matter.

Respectfully submitted,

/s/ Carrie V. O'Brien
 Carrie v. O'Brien
 Federal Bar No. 18857
 FRANKLIN & PROKOPIK, P.C.
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 Two North Charles St., Ste. 600
 Baltimore, MD 21201
 Tel.: (410) 230-3061
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 cobrien@fandpnet.com

CERTIFICATE OF SERVICE

I hereby certify that on the 14th of July, 2017, a copy of the foregoing *Statement Seeking Attorneys' Fees* was served via e-filing upon all counsel of record and by first class mail to:

March Funeral Home East, Inc.
1101 East North Avenue
Baltimore, Maryland 21202

Ms. Deborah Purnell
5913 Greenhill Avenue
Baltimore, Maryland 21206

/s/ Carrie V. O'Brien

Carrie v. O'Brien